

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JEREMY WIGLEY,
Plaintiff,

v.

UNITED STATES OF AMERICA,
Defendant.

No. 6:21-cv-00901-ADA-DTG

DEFENDANT’S DESIGNATION OF TESTIFYING EXPERTS

In accordance with the Court’s Scheduling Order, Defendant United States of America hereby lists its testifying expert witnesses.

A. Retained Experts:

**Mark A. “Tony” Freund, BSME, MSBME
Biodynamic Research Corporation
12810 West Golden Lane
San Antonio, Texas 78249**

Mr. Tony Freund is a Biodynamics Consultant. He will provide expert testimony in accordance with his report regarding the severity of the car accident in this case, the injuries alleged by Plaintiff, and the extent to which Plaintiff’s alleged injuries are consistent or inconsistent with the forces generated by the car accident. Mr. Freund’s expert opinions are based on his skill, knowledge, training, education, and professional judgment. In accordance with an agreement between the parties, docket no. 18, Mr. Freund’s report and the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) will be served not later than September 20, 2022.

Frosty Moore, MD
Legacy Bone & Joint Orthopedics
13830 Sawyer Ranch Road
Dripping Springs, Texas 78620

Dr. Moore is a board-certified orthopedic surgeon who will provide expert testimony in accordance with his report regarding the injuries alleged by Plaintiff, the extent to which those injuries were caused or aggravated by the collision at issue in this case, and the reasonableness and necessity of Plaintiff's past and future medical expenses. Dr. Moore's expert opinions are based on his skill, knowledge, training, education, and professional judgment. In accordance with an agreement between the parties, docket no. 18, Dr. Moore's report and the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) will be served not later than September 20, 2022.

B. Non-Retained Experts:

Defendant reserves the right to designate and call any experts Plaintiff has designated for the limited purpose of eliciting favorable admissions at trial, either by deposition or in person.

Respectfully submitted,

Ashley C. Hoff
United States Attorney

By: /s/ Robert Green

Robert D. Green
Assistant United States Attorney
Texas Bar No. 24087626
James E. Dingivan
Assistant United States Attorney
Texas Bar No. 24094139
601 NW Loop 410, Suite 600
San Antonio, Texas 78216
(210) 384-7362 (phone)
(210) 384-7312 (fax)
robert.green3@usdoj.gov

Attorneys for Defendant